The 10 Commandments of Environmental Compliance

1. Environmental compliance is our company's number one priority.

Our business was built upon customer service. In fact, our founder's motto was "If it's service, it's us!" Although customer service is essential to our corporate well being, it must take a second position to total environmental compliance. Since our facilities have the potential to impact our natural resources, and public health and safety, it is obvious where our first obligation must exist.

2. It is our obligation and the law to know the rules and regulations, permit terms and conditions related to our environmental control facilities.

In order to attain 100 percent environmental compliance, it is essential that all involved understand completely all rules and regulations that pertain to the operation of our facilities. Additionally, all involved managers and employees must understand completely the terms and conditions of our permits.

- **3.** Be honest and straightforward with all involved in the company's mandate of total compliance. It is essential that everyone involved at the environmental control facilities share the same commitment to total compliance. The mandate must be devoid of exceptions.
- 4. Our Environmental Compliance Director has total authority and autonomy in managing his department.

Environmental compliance starts at the top of the corporation. The President of the company is committed to total environmental compliance. The senior individual who heads the environmental department has the authority, accountability and autonomy to manage the department. To improve the chance for success, we have made our compliance program independent of line management. Our Environmental Compliance Director reports directly to the President.

5. Establish and communicate our environmental control policy.

We must communicate our policies first and foremost to our employees at our facilities. Our policy must be in writing and communicated regularly through employee updates and company meetings.

6. Follow our procedure manual.

It is essential to create and maintain a manual that identifies the rules, regulations, and permit terms and conditions at our environmental control facilities. We must identify and describe all the systems and procedures needed to attain 100 percent compliance at each facility. Be certain that the appropriate phone numbers exist to communicate emergency situations to the proper authorities

7. Actively participate in our environmental training programs.

Work to make it effective and worthwhile. The better the training program the higher propensity for success of the environmental compliance program.

8. Conduct continuous environmental audits.

The audit process is critical to the environmental compliance program. It must be done thoroughly, accurately and completely. Any deficiencies noted must be corrected immediately. Emphasis should be on the cause for the deficiencies not the symptoms. Emphasis should be on correcting problems, not assigning or avoiding blame.

9. Communicate the results of our audits to all involved parties.

Keeping everyone involved at the facilities and informed is critical to the success of the environmental compliance program. All parties involved need to know the level of their performance and to what extent changes need to be made. Total compliance by individuals, groups and divisions will be rewarded.

10. Help evaluate the performance of our Environmental Compliance Department and so we can make adjustments when necessary.

We must score ourselves as it relates to environmental compliance. Have high expectations. Don't be satisfied with anything less than total compliance.

